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*Attorneys for Defendant*  
*Harris & Harris, LTD.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BONNIE TOTH,  
Plaintiff,

v.

HARRIS & HARRIS LTD,  
Defendant.

Case No.: 2:22-cv-01756-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**[THIRD REQUEST]**

COMES NOW, Defendant Harris & Harris, Ltd. ("H&H"), by and through its undersigned counsel, GINA M. MUSHMECHE, ESQ. of KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD., and Plaintiff Bonnie Toth, by and through her undersigned counsel, GEORGE HAINES, ESQ. and GERARDO AVALOS, ESQ. of FREEDOM LAW FIRM, LLC, and hereby stipulate and agree to extend the deadline to **January 20, 2023** for Defendant to answer or otherwise plead in response to Plaintiff's Complaint.

This is the parties' third request for an extension because the parties are actively negotiating to resolve this matter. An additional two weeks will allow for the parties to work toward amicably resolving this matter. The parties do not contemplate another request accordingly.

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This request is made in good faith and not for delay.

**IT IS SO STIPULATED.**

DATED this 6<sup>th</sup> day of January, 2023.

FREEDOM LAW FIRM, LLC

/s/ Gerardo Avalos, Esq.

George Haines, Esq.

Gerardo Avalos, Esq.

8985 S. Eastern Ave., Ste. 350

Las Vegas, NV 89123

***Attorneys for Plaintiff***

DATED this 6<sup>th</sup> day of January, 2023.

KRAVITZ SCHNITZER JOHNSON  
& WATSON, CHTD.

/s/ Gina M. Mushmeche, Esq.

Gina M. Mushmeche, Esq.

8985 S. Eastern Ave., Ste. 200

Las Vegas, NV 89123

***Attorneys for Defendant***

**ORDER**

**BASED UPON THE STIPULATION OF THE PARTIES**, and good cause appearing  
therefore,

**IT IS HEREBY ORDERED, ADJUDGED and DECREED** that Defendant shall have  
until **January 20, 2023** in which to respond to Plaintiff's Complaint in the action entitled *Bonnie*  
*Toth v. Harris & Harris, Ltd.*, United States District Court, District of Nevada, Court Case No.  
2:22-cv-01756.

**IT IS SO ORDERED.**

Respectfully submitted by:  
KRAVITZ SCHNITZER JOHNSON  
& WATSON, CHTD.

/s/ Gina M. Mushmeche, Esq.

Gina M. Mushmeche, Esq.

8985 S. Eastern Ave., Ste. 200

Las Vegas, NV 89123

***Attorneys for Defendant***

  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 1/9/2023